



400 Crossing Boulevard
8th Floor
P.O. Box 5933
Bridgewater, NJ 08807
T: 908-722-0700
F: 908-722-0755

March 15, 2019

VIA ECF

Hon. Joseph A. Dickson, U.S.M.J.
Martin Luther King Building
& U.S. Courthouse
50 Walnut Street
Court Room MLK 2D
Newark, NJ 07101

Re: Dorsainvil v. Peim, et al.
Case No. 2:15-cv-3035-ES-JAD

Dear Judge Dickson:

We represent Defendants, Carol Gallagher (“Gallagher”) and Alejandrina R. Sumicad (“Dr. Sumicad”) (jointly “Defendants”), in the above-referenced matter. We provide this status report per Your Honor’s Pretrial Scheduling Order. (See Docket Entry 34).

Per the Court’s Order, Defendants served written interrogatories and a request for documents, as well as initial disclosures under cover letter dated January 31, 2019. Thereafter, on February 22, 2019, Plaintiff served written discovery requests on Defendants. No written responses have been provided to date as several motions are presently pending before Your Honor, including motions to dismiss, in lieu of filing an answer, filed on behalf of Gallagher and Dr. Sumicad, and Plaintiff’s motion for leave to file a second amended complaint. We respectfully request that the deadline to serve responses to the parties’ discovery requests be scheduled for thirty (30) days following the Court’s decisions on the pending motions in order to avoid duplication and unnecessary expense.

Thank you Your Honor for your attention to the above.

Very truly yours,

s/Margaret Raymond-Flood

Margaret Raymond-Flood

MRF/chr

cc: Wedpens Dorsainvil, pro se (via Regular Mail)

